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6 Attorneys for Debtor

7  
8 UNITED STATES BANKRUPTCY COURT  
9 NORTHERN DISTRICT OF CALIFORNIA

10 In Re:

Case No. 25-10088 WJL

11 Kingsborough Atlas Tree Surgery, Inc.

Chapter 11

12 Debtor.

13 DECLARATION OF MICHAEL FALLON  
14 IN SUPPORT OF MOTION FOR  
15 AUTHORITY TO SELL PERSONAL  
16 PROPERTY /

17 I, Michael Fallon, declare that I am an attorney licensed to practice in this court and that I  
18 am personally familiar with the statements in this declaration. If called as a witness in these  
19 proceedings I could and would testify as follows:

20 Following the hearing on the motion for authority to sell the customer list, I was  
21 instructed by the Debtor to send out a notice to the largest tree service companies in Northern  
22 California of the Debtor's intention to sell its customer list. On May 15, 2025, the attached  
23 Notice of Motion for Authority to Sell Personal Property was sent out to tree service companies  
24 in Northern California. (Dkt Nos 128, 128-1). I have not, as yet, had any response to the said  
25 notice.

26 I declare under penalty of perjury the foregoing is true and correct and that this  
27 declaration was executed by me on May 20, 2025, at Santa Rosa, California.

28 /s/ *Michael C. Fallon*

Michael C. Fallon

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11 Kingsborough Atlas Tree Surgery, Inc.

Chapter 11

12 Debtor.

13 NOTICE OF MOTION FOR AUTHORITY  
14 /  
15 TO SELL PERSONAL PROPERTY

16 Kingsborough Atlas Tree Surgery, Inc. (“Debtor”) has filed a motion for authority to sell  
17 Debtor’s Customer List at the sale price of \$200,000, all cash. You have been identified by the  
18 Debtor as a company that might have an interest in purchasing the customer list, consisting  
19 primarily of residential customers, that has been developed by the Debtor since the company  
started operating in 1982.

20 If you are interested in purchasing the client list you should contact the Debtor’s counsel,  
21 Michael Fallon, not later than Wednesday, May 28, 2025. Michael Fallon can be reached at  
22 707.546.6770 or by email at [mcfallon@fallonlaw.net](mailto:mcfallon@fallonlaw.net).

23 If one or more parties expresses an interest in purchasing the client list, an auction sale  
24 will be conducted at a date and time on not less than ten days notice to the parties who wish to  
25 participate in the auction sale.

26 Dated: May 15, 2025

27 */s/ Michael C. Fallon*  
Michael C. Fallon  
28 Attorney for Debtor

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6 Attorneys for Debtor

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8 UNITED STATES BANKRUPTCY COURT  
9 NORTHERN DISTRICT OF CALIFORNIA

10 In Re: Case No. 25-10088 WJL

11 Kingsborough Atlas Tree Surgery Inc. Chapter 11  
12 Debtor.

13 \_\_\_\_\_ /  
14 CERTIFICATE OF SERVICE

15 I, Merla Anders, declare:

16 I am a citizen of the United States and resident of Sonoma County, California, I am over  
17 the age of eighteen and not a party to the within entitled action; my business address is 100 E  
18 Street, Suite 219, Santa Rosa, California 95404.

19 On May 15, 2025, I served the NOTICE OF MOTION FOR AUTHORITY TO SELL  
20 PERSONAL PROPERTY on the said action by placing a true copy thereof, enclosed in a  
21 sealed envelope, with postage thereon fully prepaid in the United States mail at Santa Rosa,  
California and/or via email addressed as follows:

22 SEE ATTACHED LIST

23 I declare under penalty of perjury that the foregoing is true and correct. Executed on  
24 May 15, 2025, at Santa Rosa, California.

25 /s/ Merla Anders  
MERLA ANDERS

Arborworks  
40266 Junction Drive  
Oakhurst, Ca. 93644  
559-641-2434  
[information@arborworksinc.com](mailto:information@arborworksinc.com)

West Coast Arborist  
2200 E. Via Burton Street  
Anaheim, Ca. 92806  
800-521-3714  
[corporate@wcainc.com](mailto:corporate@wcainc.com)

Signature Tree Solutions  
1250 Church Street, Suite R2  
St. Helena, Ca. 94574  
707-963-3333  
[info@signaturetreesolutions.com](mailto:info@signaturetreesolutions.com)

Wright Tree Service  
Post Office Box 1718  
Des Moines, Iowa, 50306  
800-882-1216

Mountain Enterprises  
950 Iron Point Road, Suite 210  
Folsom, Ca. 95630  
530-626-4127  
[MFE@Mtfent.com](mailto:MFE@Mtfent.com)

Professional Tree  
2828 8th Street  
Berkeley, Ca. 94710  
510-549-3954

Bartlett Tree Service  
22725 Eighth Street East, Suite B  
Sonoma, Ca. 95476  
707-935-3220  
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